

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

**[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendant.**

CRIMINAL NO. 22-342 (SCC)

**PARTIES' JOINT MOTION REQUESTING CLARRIFICATION OF FILING
DEADLINES**

The United States of America and defendants, Mr. Herrea, Ms. Vazquez, and Mr. Rossini, file this joint motion requesting clarification of certain deadlines related to motion practice in this case. Specifically, as it relates to the Government's recent Designation of Evidence and Rule 404(b) Notice. The parties agree that the defendants should have until September 27, 2024 (the Dispositive Motions Deadline) and until November 1, 2024 (the Motion in Limine Deadline), to file motions related to the Government's filings. In support of this, the parties state as follows:

1. On June 3, 2024, the Court set a series of deadlines related to the motions practice in this case. Specifically, the Court set a deadline of August 30, 2024, for the Government to file a Designation of Evidence, Disclose *Jencks* and *Giglio* material, and provide Notice of 404(b) material. *See* ECF No. 566. The Court also set a deadline for Dispositive Motions (September 27, 2024) and Motions in Limine (November 1, 2024).

2. The parties believe that those deadlines were set to provide substantial time for the parties to brief their positions on evidentiary issues ahead of trial and for the opposing parties to respond accordingly. This would include an opportunity for the defendants to file motions in response to the Government's mandated filings.

3. In response to the Government's Designation and Rule 404(b) Notice the ECF filing system has auto-generated deadlines to respond on September 13, 2024. The parties request clarification that that deadlines set by the Court on June 3, 2024 supersede the ECF generated deadlines and that they are free to ignore the September 13, 2024 deadlines.

WHEREFORE, the United States and defendants, through counsel, requests that the Court clarify that the deadlines imposed on June 3, 2024 remain the deadlines for the parties to file motions.

RESPECTFULLY SUBMITTED, this 11th day of September, 2024.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

/s/ Nicholas W. Cannon
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Certificate of Service

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

s/Nicholas W. Cannon
Nicholas W. Cannon